Remarks

Claims 100-119 stand rejected and remain pending. No claims are amended herein. The Applicant respectfully requests allowance of claims 100-119.

Claim Rejection Under 35 U.S.C. § 103

Claims 100-119 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0046255 to Moore et al. (hereinafter "Moore") in view of U.S. Patent No. 5,991,381 to Bouanaka et al. (hereinafter "Bouanaka"). (Page 2 of the final Office action.) The Applicant respectfully traverses the rejection on the basis of the following discussion.

Method claim 100 provides, in part, "*in a first one of the web-sites, interacting with a first one of the end-users over the Internet, and in response, transferring a first communication account request over the Internet to an account server….*" (Emphasis supplied.) Further, claim 100 provides "*in the account server, validating the first web site in response to receiving the first communication account request … and transferring the first account code over the Internet to the first web site.*" System claim 110 incorporates similar provisions.

The final Office action alleges that Moore teaches all limitations of claim 100, except for validating the web site in response to receiving the first communication account request in the account server. (Page 3 of the final Office action.) The final Office action further alleges that "Bouanaka teaches a server that validates a request in response to receiving a communication account request (figure 2: 40). At the time the invention was made, one of ordinary skill in the art would have been motivated to validate a website in response to receiving a request in order to process user's request automatically, thus allowing users to access the resource." (Id.) The Applicant respectfully disagrees with these allegations, as the combination of Moore and Bouanaka neither teaches nor suggests many of these limitations.

Account Server, and Communication Therewith

Generally, Moore discloses an open network architecture system 100 which "is accessible via a network connection through the network 110, such as the Internet, for allowing a plurality of customers, such as individual end-users having a web browser, to ubiquitously access the

system 100 for purchasing prepaid services and/or usage rights thereof, and managing and viewing their prepaid online accounts, etc. in real-time. ... The system 100 is associated with one or more web-sites having corresponding URLs for enabling the plurality of customers to interface with the system 100 via the network 110." (Paragraph [0026] and Fig. 1.) Further, "[e]ach of the web-sites is maintained by web-site system hardware 120," which comprises part of the system 100 and performs the various functions of the system. (Paragraph [0027] and Fig. 1.) One of these functions is "managing a plurality of databases connected to the web-site system hardware 120." (Id.) Thus, the end-users communicate with the web-site system hardware 120, which directly supplies the prepaid services without communication with another system or server. Therefore, Moore does not teach or disclose "in a first one of the web-sites, ... transferring a first communication account request over the Internet to an account server," as provided for in claim 100, and incorporated similarly into claim 110, since Moore does not disclose a separate account server, much less a website *and* an account server *communicating over the Internet.*

Moore also discusses allowing customers of outside system operators to utilize the system 100 by way of network hardware 180, such as a server and a gateway coupled to the web-site system hardware by way of a *dedicated link*, and hence not over the Internet. (Paragraph [0041].) The network hardware 180 thus allows the operators to offer their own prepaid services by way of the system 100. (Paragraph [0041].) In the same fashion as described above, the end-user interfaces "with the web-site system hardware 120 via a web-site associated with the website system hardware 120 and personalized for the outside system operator(s)." (Paragraph [0042].) Moore also proposes hyperlinking the customer to the web-site system hardware 120 via the operator's own website. (Paragraphs [0041] and [0044].) Hyperlinking thus brings the end-user in direct communication with the web-site system hardware 120. Therefore, in the case of an outside system operator, Moore does not teach or suggest a separate account server, or communications between a web-site and an account server over the Internet, as provided for in claims 100 and 110 of the present application.

The final Office action indicates that paragraphs [0010; 0016] of Moore teach a website transferring a first communication account request over the Internet to an account server in response to interaction between an end-user and the website. (Page 2 of the final Office action.) However, paragraph [0010] only describes a subscriber accessing a signaling agent's website to

purchase additional time for a service, while paragraph [0016] generally describes the system shown in Fig. 1, which contains several databases coupled with the web-site system hardware 120, and "a network [110], such as the Internet, for providing customers with ubiquitous access to the databases for viewing and managing prepaid online accounts...." No mention is made of a separate account server, or communication between the website and the account server of a communication account request over the Internet.

Under an alternate theory presented in the "Response to Arguments" section, the final Office action indicates that *Bouanaka teaches a separate account server and communication between a web-server and an account server*. Specifically, figure 1, as well as its corresponding description (col. 2, lines 13-37) teaches a *telephone system 20 (interpreted as account server)* that receives requests from computer network 10 and *validates account information*. The *computer network 10 (interpreted as website)* comprises a calling card computer terminal 18 that *receives and processes requests from customers 12*. (Pages 5 and 6 of the final Office action; emphasis supplied.) However, these aspects of Bouanaka do not correspond with the various limitations of claim 100. For example, Bouanaka does not appear to mention web sites at all, much less in connection with the computer network 10. Thus, the Applicant respectfully asserts that Bouanaka does not teach the use of a web site, much less a web site in communication with a separate account server. Further, as is discussed below, the *account validation* of the Bouanaka telephone system does not teach or suggest the *web site validation* of claim 100, as two different types of validation are involved. Thus, no combination of Moore and Bouanaka shows a communications between a web site and a separate account server over the Internet, and such indication is respectfully requested.

Website Validation

As indicated in the final Office action, Moore does not teach or suggest "in the account server, *validating the first web site* in response to receiving the first communication request." (Page 3 of the final Office action.) However, the final Office action alleges that "Bouanaka teaches a server that *validates a request* in response to receiving a communication account request (figure 2: 40)." (Page 3 of the final Office action; emphasis supplied.) The Applicant respectfully notes two separate problems with this allegation. For one, whether Bouanaka validates *a request* is unimportant, as claim 100 provides for validation of *the website*

transferring the communication account request over the Internet to the account server, *not* the request itself.

In its Response to Arguments, the final Office action indicates that "it is not the website, but the user request message (through the web server) that is validated as evidence[d] by the specification [at] page 7[,] lines 14-20. In fact, nowhere in the specification discusses any validation of a website." (Page 6 of the final Office action.) The Applicant respectfully disagrees. The portion of the present application cited in the final Office action states that "the communication account system 300 receives the communication account request message and processes the message to *validate the web server 301* at step 404. The validation process includes performing a lookup operation that *compares an address identification associated with the web server 301 with a list of valid web server address identifications.*" (Page 7, lines 17-21; emphasis supplied.) Thus, both the cited portion of the specification and the claims in question indeed disclose validation of a web site (i.e., a web server) and, conversely, do *not* indicate that the request message is being validated. In addition, while the final Office action refers to the request message as a "user request message," claims 100 and 119 only refer to a "communication account request," and do not require that a user initiate the request.

Secondly, the Applicant respectfully contends that Bouanaka does not teach or suggest the validation of a website, as indicated above. Generally, Bouanaka discloses "[a] calling card validation method and system for automatically issuing calling cards and placing charges on customer's telephone bill." (Abstract.) To this end, a calling card computer terminal 18 of a computer system 10 receives a user's request for a calling card, processes the request, and issues a calling card request message (CCRM) to a database server 26 of a telephone system 20. (Fig. 1; operations 30-38 of Fig. 2, and column 3, lines 35-65.) In response, the database server 26 accesses a database containing customer account and billing information so that the charges for the calling card may be added to the customer's telephone account. (Fig. 1; operations 40-48 of Fig. 2; and column 3, line 66, to column 4, line 6.) Thus, in Bouanaka *the existence of the customer's telephone account* is being validated, not a website, and not the request for a calling card. (See, for example, operation 40 of Fig. 2, which discloses the operation of "search[ing] telephone database for *telephone account validation.*" (Emphasis supplied.) In fact, Bouanaka does not appear to mention websites at all (as discussed above), much less their validation. Thus, Bouanaka does not teach or suggest validation of a website, as provided for in claim 100,

and such indication is respectfully requested.

Motivation to Combine Moore and Bouanaka

The final Office action also indicates that "[a]t the time the invention was made, one of ordinary skill in the art would have been motivated to *validate a website in response to receiving a request in order to process [the] user's request automatically, thus allowing users to access the resource.*" (Page 3 of the final Office action.) The Applicant respectfully disagrees for two reasons. The websites of Moore does not appear to require any kind of validation since all of the websites disclosed therein are hosted on a single website system hardware 120. Further, Moore appears to already process user requests for communication service at least as automatically as Bouanaka. Thus, the Applicant asserts that no motivation exists to combine Moore with Bouanaka, and such indication is respectfully requested.

Given the foregoing, the Applicant asserts that claims 100 and 110 are allowable in view of the combination of Moore and Bouanaka for at least the reasons provided above, and such indication is respectfully requested.

Claims 101-109 depend from independent claim 100, and claims 111-119 depend from independent claim 110, thus incorporating the provisions of their corresponding independent claims. Thus, the Applicant contends that claims 101-109 and 111-119 are allowable for at least the same reasons provided above regarding claims 100 and 110, and such indication is respectfully requested.

Therefore, in light of the reasons set forth above, the Applicant respectfully requests that the 35 U.S.C. § 103(a) rejection of claims 100-119 be withdrawn.

Conclusion

Based on the above remarks, the Applicant submits that claims 100-119 are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Applicant thus respectfully requests allowance of claims 100-119.

The Applicant believes no fees are due with respect to this filing. However, should the Office determine additional fees are necessary, the Office is hereby authorized to charge Deposit Account No. 21-0765 accordingly.

Respectfully submitted,

Date: 10/10/2007   /Kyle J. Way/

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